

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**  
No. 5:19-cv-249-FL

MATTHEW BRADLEY,	)	
	)	
Plaintiff,	)	
	)	
- against –	)	<b>2D DECLARATION OF</b>
	)	<b>RICHARD LIEBOWITZ</b>
	)	
ANALYTICAL GRAMMAR, INC.	)	
	)	
	)	
	)	
Defendant.	)	

**RICHARD LIEBOWITZ**, under the penalty of perjury, declares:

1. I am an attorney with Liebowitz Law Firm, PLLC (“LLF”), where I am the founder and managing attorney.
2. I am admitted to practice before this Court and serve as counsel for Plaintiff Matthew Bradley (“Plaintiff”).
3. I submit this declaration in further support of Plaintiff’s motion for partial summary judgment on liability for copyright infringement under 17 U.S.C. § 501 against Defendant Analytical Grammar, Inc. (“Defendant”), and for attorneys’ fees and costs.
4. None of the documents produced as part of Docket No. 45, or referenced in Defendant’s Separate Statement of Additional Undisputed Facts at Docket No. 44, pp.19-23 of 23, were produced or disclosed during the discovery period in this action. Indeed, none of those documents are bate-stamped with the prefix AG, as per all other documents produced by Defendant.
5. None of Defendant’s Rule 26 initial disclosures or responses to Plaintiff’s request for interrogatories disclosed or identified Michael Duffey as a witness in this action.

6. Attached as Exhibit A is a true and correct copy of the Defendant's Rule 26(a) disclosures, served on October 23, 2019.

7. Attached as Exhibit B is a true and correct copy of Defendant's Responses to Plaintiff's First of Interrogatories, served on November 23, 2019.

8. Attached as Exhibit C is a true and correct copy of Defendant's Amended Responses to Plaintiff's First of Interrogatories, served on February 21, 2020.

Dated: Valley Stream, New York  
Executed this 21st Day of August, 2020

s/richardliebowitz/  
RICHARD LIEBOWITZ